

CRIMINAL COMPLAINT
(Submitted electronically)

United States District Court	DISTRICT of ARIZONA
<p style="text-align: center;">United States of America</p> <p style="text-align: center;">v.</p> <p style="text-align: center;">Mohamed Shouman</p> <p style="text-align: center;">DOB: 1975, United States Citizen</p>	<p>DOCKET NO.</p> <hr/> <p>MAGISTRATE'S CASE NO.</p> <p style="text-align: center;">24-02076MJ</p>
<p>Complaint for violation of: Title 18, United States Code, §§ 1204(a) and (b)</p>	
<p>COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:</p> <p>On or about May 23, 2024, to the present, in the District of Arizona, the Defendant, Mohamed Shouman did knowingly remove a child, that is, John Doe, who has not attained the age of 16 years and retained said child (who had been in the United States) outside the United States with intent to obstruct the lawful exercise of parental rights; in violation of Title 18, United States Code, Sections 1204(a) and (b).</p>	
<p>BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:</p> <p>On May 23, 2024, at approximately 8:00 AM, S.M. left her residence for work. She returned at approximately 5:00 PM and found that her sons ages 16 and 12 years old were gone. The 12-year-old son is John Doe. S.M. discovered a note left in her child's handwriting that said the following: "Mama we went to vacation to baba, and you are welcome to join us whenever you want and baba will send the ticket."</p> <p>S.M. has been embroiled in a lengthy custody battle with her estranged husband and father to her two sons, the Defendant Mohamed Shouman. The family had all previously lived in Turkey together. After moving to the United States and bringing her sons with her, S.M. filed to dissolve the marriage and work for child custody. Shouman counter filed on S.M. in the United States and in Turkey. In March of 2020, Shouman attempted to take the boys from S.M. by chartering a private aircraft days before a custody hearing to be held in Pima County, Tucson, Arizona, but the attempt was subverted. An associate/friend of Shouman attempted to help Shouman take the boys.</p> <p>S.M., while living in Tucson, Arizona, had constructive physical custody of John Doe by virtue of court orders entered in 2020 in Arizona Superior Court, Pima County, State of Arizona, in a pending dissolution of marriage case in Case Numbers DC20200002 and 020202312. In a court ruling entered by the Honorable J. Assini, Arizona Superior Court, Pima County, State of Arizona, on May 15, 2020, in Case No. DC20200002, a Petition for the Return of the Children filed by Shouman against S.M. was denied. Judge Assini ordered the children (which includes John Doe) would not be returned to Turkey, the habitual residence of Shouman, and that the children were to remain in Tucson, Arizona, (in the United States) "under the care of [S.M.]</p> <p>(BASIS OF COMPLAINT CONTINUED ON REVERSE.)</p>	
<p>MATERIAL WITNESSES IN RELATION TO THE CHARGE: N/A</p>	
<p>DETENTION REQUESTED</p> <p>Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.</p> <p style="text-align: right;">RAQUEL ARELLANO <small>Digitally signed by RAQUEL ARELLANO Date: 2024.05.24 14:35:41 -07'00'</small></p> <p>AUTHORIZED BY AUSA <i>R. Arellano</i></p>	<p>SIGNATURE OF COMPLAINANT</p> <p>SEAN C DORSEY <small>Digitally signed by SEAN C DORSEY Date: 2024.05.24 14:43:02 -07'00'</small></p> <hr/> <p>OFFICIAL TITLE & NAME:</p> <p>FBI Task Force Officer Sean Dorsey</p>
<p>Sworn to telephonically. <input checked="" type="checkbox"/></p>	
<p>SIGNATURE OF MAGISTRATE JUDGE¹⁾</p> <p style="text-align: center;"><i>Seane M. Merenda</i></p>	<p>DATE</p> <p>May 24, 2024</p>

¹⁾ See Federal Rules of Criminal Procedure Rules 3, 4.1, and 54

(BASIS OF COMPLAINANT’S CHARGE AGAINST THE ACCUSED CONTINUED.)

until such time a Court of competent jurisdiction can make custodial decisions regarding the legal decision making and parenting time of the children.”

In a subsequent Preliminary Injunction filed against **Shouman** by S.M. dated August 14, 2020 in Arizona Superior Court, Pima County, Tucson, Arizona, Case No. 020202312, a court order was entered enjoining and prohibiting **Shouman** and S.M. from removing their children presently residing in the State of Arizona from the jurisdiction of the court without prior written consent of the other party or the permission of the court. The court order stated the injunction would be effective until a final decree of dissolution, legal separation or annulment was filed, or the action was dismissed. As of May 24, 2024, no such final decree has been filed nor has the action been dismissed. In an Order to Surrender Passports filed on March 13, 2020, Judge Assini ordered that neither party in that court case shall remove, or directly or indirectly assist, ratify, or consent to the removal of the children from Pima County, Arizona, until the court entered judgment in the case. As of May 24, 2024 no such judgment has been entered in the case.

On May 23, 2024, Marana Police Department (Marana PD) police officers responded to S.M.’s residence located on Orange Grove Rd., Tucson, Arizona and took statements. The children left their phones and other electronics at the residence. Prior to leaving his phone, the older son notified his friend via WhatsApp Message that he was going with his father on vacation to Istanbul.

Marana PD officers canvassed the apartment complex and did not encounter witnesses nor any viable camera footage. At approximately 7:50 PM, a Marana PD officer attempted to contact **Shouman** via his listed cell number. The call was answered, but quickly hung up. Continuous phone pings were initiated by Marana PD but yielded no results. Marana PD stated they would continue constant pings.

At approximately 7:15 PM, FBI Agents were notified of the situation by Marana PD. FBI began coordinating with the Tucson Airport Authority, TSA, CBP, and Marana PD in attempts to locate **Shouman** and confirm he had not taken a flight from Arizona. **Shouman’s** travel information was found.

A query of CBP databases revealed the following:

On 05/21/24, **Shouman** flew from Istanbul, Turkey to Mexico City. He then entered the United States via a pedestrian gate in San Ysidro, California on 05/22/24 at 11:57 AM.

Shouman and his sons (which includes John Doe) were all listed on the passenger manifest for Turkish Airlines flight 189 departing from Mexico City to Cancun, departing on 05/25/2024 at 3:45 AM, Central Standard Time (CST) arriving in Cancun at 6:55 AM, Eastern Standard Time (EST). Flight 189 is then scheduled to depart Cancun at 8:40 AM EST arriving at Istanbul at 4:45 AM, local time.

At approximately 9:00 PM, FBI notified law enforcement in Mexico as a preventative measure. Mexico City and Tijuana airports and law enforcement were notified. Alerts for **Shouman** and his sons were generated.

At approximately 11:45 PM, FBI contacted T-Mobile for an exigent precise ping of **Shouman’s** phone. Location resolved to Garden Grove near San Diego, California at 6:36 PM on 05/23/24.

FBI received information from Marana PD that **Shouman** and his sons (which includes John Doe) are currently very likely staying at a Marriott Hotel in Mexico City.